

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION**

**CITY OF CEIBA, PUERTO RICO**

)

**MDL NO. 2873**

)

**Plaintiff,**

)

**Master Docket No: 2:18-mn-2873-RMG**

)

**JUDGE RICHARD GERGEL**

)

**v.**

)

**Civil Action No: 2:24-cv-04110-RMG**

)

**3M COMPANY et al.**

)

)

**Defendants.**

)

**PLAINTIFF'S MOTION FOR LEAVE TO AMEND COMPLAINT**

Plaintiff moves this Court for entry of an Order granting Plaintiff leave to file an Amended Complaint pursuant to rule 15(a)(2) of the Federal Rules of Civil Procedure, *nunc pro tunc*, and in support thereof states as follows:

1. On June 3, 2024, Plaintiff filed an initial complaint in 2:24-cv-04110-RMG [Docket No. 1.]
2. Plaintiff intends to add Defendants United States Department of the Navy, and United States of America.
3. Plaintiff intends to add a cause of action for Comprehensive Environmental Response, Compensation, and Liability Act against defendants United States Department of the Navy, and United States of America.
4. Plaintiff intends to add additional clarifying language surrounding the cause of action for Comprehensive Environmental Response, Compensation, and Liability Act against defendants in proposed amended complaint.
5. Rule 15(a)(2) of the Federal Rules of Civil Procedure allows a party to amend its pleading upon leave from the court.

6. Plaintiff's counsel has conferred with co-leads, and they have not objected to this filing. A redlined copy of the first amended complaint is attached as Exhibit A.

7. Plaintiff has met and conferred with the United States Department of Justice prior to the filing of this motion.

WHEREFORE, Plaintiff, moves this Court for entry of the Proposed Order granting Plaintiff leave to file the Amended Complaint *nunc pro tunc*, and to rescind order granting Plaintiff's previous motion to amend.

/s/ Gary Anthony Anderson

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